

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA, ON BEHALF OF)	
ITS AGENCY, SECRETARY OF U.S. DEPARTMENT)	
OF HOUSING AND URBAN DEVELOPMENT,)	
)	
Plaintiff,)	
)	
v.)	Case No.: 14-cv-2515
)	
WILLIAM P. BUTHER AS SPECIAL REPRESENTATIVE))	
OF THE ESTATE OF ROOSEVELT BALDWIN;)	
ALBERTA BALDWIN; ROOSEVELT BALDWIN, JR.;)	Judge: James F. Holderman
ROSE MARY JOHNSON; UNKNOWN HEIRS AND)	
LEGATEES OF ROOSEVELT BALDWIN; UNKNOWN)	
HEIRS AND LEGATEES OF ALBERTA BALDWIN;)	Magistrate Judge: Sheila
UNKNOWN OWNERS AND NON-RECORD)	Finnegan
CLAIMANTS,)	
)	
Defendants.)	

MOTION FOR ENTRY OF JUDGMENT OF FORECLOSURE

NOW COMES, Plaintiff, UNITED STATES OF AMERICA, ON BEHALF OF ITS
AGENCY, SECRETARY OF U.S. DEPARTMENT OF HOUSING AND URBAN
DEVELOPMENT, by and through its attorneys, Potestivo & Associates, P.C., and moves
this Honorable Court, for the Entry of a Judgment of Foreclosure.

In support, attached please find Plaintiff's Affidavit of Prove-Up. (See Exhibit "1",
Affidavit).

Respectfully submitted,

ZACHARY T. FARDON

United States Attorney

By: s/Caleb J. Halberg
CALEB J. HALBERG
Attorney for the United States
223 W. Jackson Blvd., Suite 610
Chicago, IL 60606
(312) 263-0003
chalberg@potestivolaw.com

CERTIFICATE OF SERVICE

I, Caleb J. Halberg , certify that a true and correct copy of the foregoing **Motion for Entry of Judgment of Foreclosure** was served upon counsel of record, if any, through operation of the Court's Case Management/Electronic Case Files system on November 19, 2014, and on the following non-ECF filers by first class mailing on November 20, 2014:

William P. Butcher as Special Representative of the Estate
of Roosevelt Baldwin and Estate of Alberta Baldwin
2044 Ridge Road
Homewood, IL 60430

Roosevelt Baldwin, Jr.
718 Holly Street
North Lauderdale, FL 33068

Rose Mary Johnson
755 S. Kenneth
Chicago, IL 60624

Unknown Heirs and Legatees of
Roosevelt Baldwin
755 S Kenneth
Chicago, IL 60624

Unknown Heirs and Legatees of
Alberta Baldwin
755 S Kenneth
Chicago, IL 60624

Unknown Owners and
Non-Record Claimants
755 S. Kenneth
Chicago, IL 60624

s/Caleb J. Halberg
CALEB J. HALBERG
Attorney for the United States
223 W. Jackson Blvd., Suite 610
Chicago, IL 60606
(312) 263-0003
chalberg@potestivolaw.com